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*National Consumer Telecom & Utilities Exchange*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

ROBERT VERKLAS,

Plaintiff,

vs.

NATIONAL CONSUMER TELECOM &  
UTILITIES EXCHANGE and DATA  
SOLUTIONS, INC.,

Defendants.

**Case No. 2:23-cv-00381-RFB-BNW**

**JOINT MOTION FOR EXTENSION OF  
TIME FOR DEFENDANT NATIONAL  
CONSUMER TELECOM & UTILITIES  
EXCHANGE TO FILE ANSWER**

**FIRST REQUEST**

Defendant National Consumer Telecom & Utilities Exchange (“NCTUE”) has requested an extension of time to answer, move or otherwise respond to the Complaint in this matter, to which Plaintiff has no opposition. Accordingly, pursuant to LR IA 6-2, IT IS HEREBY STIPULATED AND AGREED to by and among counsel, that Defendant NCTUE’s time to answer, move or otherwise respond to the Complaint in this action is extended from May 1, 2023 through and including **May 11, 2023**. The request was made by NCTUE so that it can have an opportunity to

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1 collect and review its internal files pertaining to the allegations in the Complaint, and Plaintiff  
2 approves. This stipulation is filed in good faith and not intended to cause delay.

3 Respectfully submitted, this 3<sup>rd</sup> day of May, 2023.

4  
5 CLARK HILL PLLC

6 By: /s/Gia N. Marina  
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14 *Attorney for Defendant National Consumer*  
15 *Telecom & Utilities Exchange*

**No opposition**

/s/Gerardo Avalos  
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Gerardo Avalos, Esq.  
Nevada Bar No. 15171  
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*Attorneys for Plaintiff*

16 IT IS SO ORDERED:

17   
18 United States Magistrate Judge

19 DATED: May 4, 2023  
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**CERTIFICATE OF SERVICE**

I hereby certify that a true and exact copy of the foregoing has been served this 3<sup>rd</sup> day of May, 2023, via CM/ECF, upon all counsel of record:

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